



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX**

75 Hawthorne Street
San Francisco, CA 94105

Via Electronic Mail and U.S. Postal Service Mail

July 15, 2011

Gray Boucillon
Cobalt Industrial REIT
5606 North MacArthur Boulevard, Suite 350
Irving, TX 75038

John Chilcott
President, VJ2C, Inc.
2737 E. Arizona Biltmore Circle #4
Phoenix, AZ 85018

Re: Polychlorinated Biphenyls (PCBs), Toxic Substances Control Act – June 27, 2011 “Progress Report Final Site Characterization and Closure Former EPSI Facility, Phoenix, Arizona” – USEPA Requirements for Additional Work

Dear Mr. Boucillon and Mr. Chilcott:

Thank you for submitting the “*Progress Report Final Site Characterization and Closure Former EPSI Facility, Phoenix, Arizona*” (Progress Report) dated June 27, 2011 and prepared by Environmental Resources Management (ERM) for Earth Protection Services Inc. (EPSI). The U.S. Environmental Protection Agency (USEPA) approves EPSI’s proposed additional site characterization as modified by the requirements for additional characterization sampling established below.

Additional Site Characterization Sampling

This additional work is being required under 40 CFR 761.61(c), risk-based cleanup option.

- 1. Collection of additional bulk dust samples and standard wipe samples.** The bulk ceiling dust sample collected in Area A8 showed total PCBs were detected at 6.29 mg/kg (4.96 mg/kg Aroclor 1242 and 1.33 mg/kg Aroclor 1254). Based on this finding, EPSI shall propose additional dust (bulk and wipes) sampling locations in areas A1 through A7 to demonstrate that PCB containing dust is not present in the interior of the building.
- 2. Additional concrete samples.** Total PCBs were detected in concrete sample GUT-S-C at 6.64 mg/kg. Additional step out concrete samples should be collected to the east, west, north, and south of the location of GUT-S-C. Propose the sampling grid for these step-out samples.
- 3. Additional soil samples.** Samples A3-C-1-T-0.5 (expansion joint) and A3-C-2-T-0.5 (expansion joint) show total PCBs were detected in the concrete at 0.5 inches in concentrations equal to 27.52 mg/kg and 129.61 mg/kg, respectively. USEPA is requiring that soil samples be collected at 0 to 3 inches beneath the concrete-soil interface below these expansion joints as well as below and along the crack in Area A4. Propose the number, location, and spacing of the required soil samples. Based on our review of the Progress Report it is not clear if the concrete samples mentioned above are for two different expansion joints or one joint. If two different joints are involved, the soil sampling requirements established in this Condition apply to each of the joints.

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c)
Former Earth Protection Services, Inc. Facility, Phoenix, Arizona
Date: July 15, 2011

We look forward to EPSI's implementation of the approved additional PCB site characterization work as modified by USEPA's conditions of approval herein. Please call Carmen D. Santos at 415.972.3360 or Edwin Poalinelli at 415.972.3390 if you have any questions concerning this conditional approval.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Scott', is written over the typed name and title.

Jeff Scott
Director
Waste Management Division

Cc: Mary Parke, ERM
Ivan Lieben, USEPA R9
Arlene Kabei, USEPA R9
Steve Armann, USEPA R9
Carmen Santos, USEPA R9
Edwin Poalinelli, USEPA R9
Patrick Wilson, USEPA R9